



U.S. Department of Energy
Office of River Protection

P.O. Box 450, MSIN H6-60
Richland, Washington 99352

0074701

DEC 06 2007

07-ESQ-221

Mr. John C. Fulton, President
and Chief Executive Officer
CH2M HILL Hanford Group, Inc.
2440 Stevens Center Place
Richland, Washington 99354

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EDMC

Dear Mr. Fulton:

CONTRACT NO. DE-AC27-99RL14047 – SUBMITTAL OF U.S. DEPARTMENT OF
ENERGY, OFFICE OF RIVER PROTECTION SURVEILLANCE FOR THE 222-S
LABORATORY WASTE ACCUMULATION AREAS

This letter transmits the Dangerous Waste Regulations Surveillance for 222-S Laboratory
Waste Accumulation Areas. The purpose of the surveillance was to determine if field conditions
for the non-radiation satellite accumulation areas and 90-day accumulation areas met the
regulations. There were no Findings or Observations. If you have any questions, please contact
me, or your staff may contact Gae M. Neath, Environmental Compliance Division,
(509) 376-7828.

Sincerely,

for Shirley J. Olinger, Manager
Office of River Protection

ESQ:GMN

Attachment

cc w/attach:

S. L. Dahl, Ecology

Administrative Record *TS-2-1*

Environmental Portal, LMSI

Attachment
07-ESQ-221

222-S Laboratory Waste Accumulation Areas Surveillance Report

222-S LABORATORY WASTE ACCUMULATION AREAS SURVEILLANCE REPORT



NOVEMBER 2007

Office of Environmental Safety and Quality

U.S. Department of Energy
Office of River Protection
P.O. Box 450, H6-60
Richland, Washington 99354

Approved: _____

W. S. Taylor
Assistant Manager, ESQ

Date: _____

12/04/07

Approved: _____

M. A. B. [Signature]
Tank Farm Project Manager

Date: _____

12/6/07

222-S Laboratory Waste Accumulation Areas Surveillance

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222-S Laboratory Waste Accumulation Areas Surveillance

Title of Surveillance:

Hazardous Waste Containers Surveillance

Dates Surveillance Conducted:

November 13, 2007.

Surveillance Team:

Field Surveillance: Gae Neath (Lead), Office of Environmental Safety and Quality; Don Sommer, Support Services; and Courtney Blanchard, Facility Representative.

Summary of Surveillance Activities:

This surveillance evaluated field conditions to determine if the 222-S Laboratory accumulation of hazardous waste met Dangerous Waste Regulations. The non-radiation satellite accumulation areas and 90-day accumulation areas was accessible during the surveillance. The evaluators found field conditions to be in compliance with the regulations.

Documentation Reviewed for Surveillance:

- ATS-LO-110-129, "Laboratory Operating Procedure, Generation of Non-radioactive Waste and Recyclable Materials," Revision G-0, dated July 12, 2007.
- ATS-LO-100-166, "Waste Management Areas," Revision J-0, dated July 24, 2007.

Findings and Observations:

No Findings or Observations were identified.

ORP Management Debriefed:

The Division Director of Environmental Compliance Division was briefed after the surveillance.

Waste Treatment Plant Dangerous Waste Permit Surveillance for the
High Level Waste Miscellaneous Treatment Unit Subsystems

Surveillance Conformance Summary:

Criteria or Component	Reference (e.g. Permit Condition No. or document no.)	Requirement (e.g. Permit Condition Description)	Conformance Summary
Hazardous Waste Containers	40 CFR 262.34(a)(1)(i) and 265.177 WAC 173-303-630(9)(c)	Verify that containers are separated or protected from incompatible waste by a dike, berm, wall or other device.	Containers were stored in Building HS-0065 (see Figures 1-3).
Satellite Accumulation Points	40 CFR 262.34(c) WAC 173-303-200(a)	Verify that satellite accumulation point is at or near the point of generation and is under control of the operator.	The satellite accumulation area in 222-SA was located in a separate room (see Figure 4).
	WAC 173-303-630(5)(a)	Verify that containers are in good condition and containers are kept closed except when waste is being added or removed.	Containers were in good condition and securely closed.
	WAC 173-303-630(3)	Verify that containers are marked 'Hazardous Waste' or other appropriate identification.	Containers were labeled appropriately.
	WAC 173-303-200(2)(b)	Verify that when waste is accumulated in excess of quantity limitations, the waste is transferred to a 90-day or permitted storage area within 3 days.	There were no containers that had reached the 90-day storage limit.

Waste Treatment Plant Dangerous Waste Permit Surveillance for the
High Level Waste Miscellaneous Treatment Unit Subsystems

Appendix A - Surveillance Photos

Figure 1
Building HS-0065



Waste Treatment Plant Dangerous Waste Permit Surveillance for the
High Level Waste Miscellaneous Treatment Unit Subsystems

Appendix A (continued)

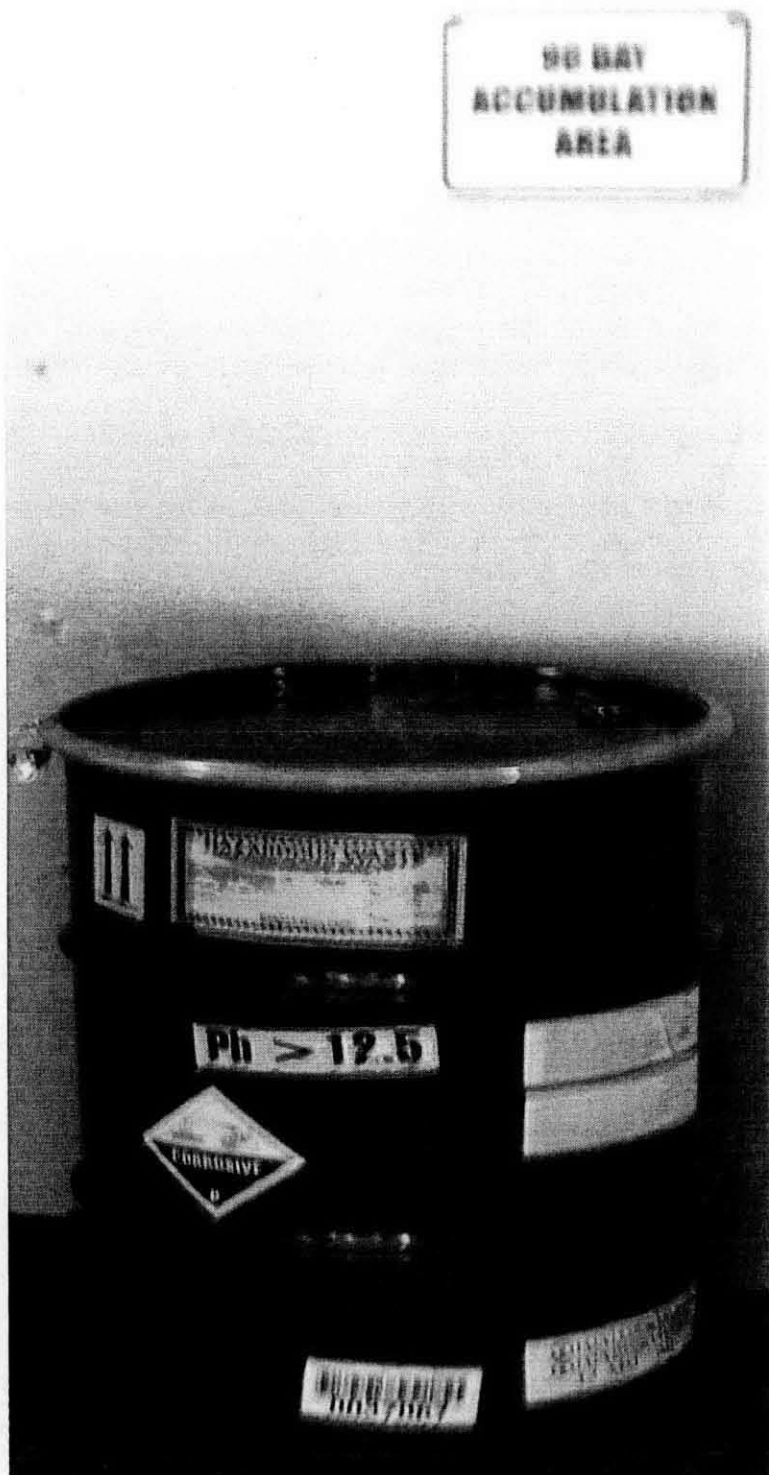
Figure 2
Drum in HS-0065 West



Waste Treatment Plant Dangerous Waste Permit Surveillance for the
High Level Waste Miscellaneous Treatment Unit Subsystems

Appendix A (continued)

Figure 3
Drum in HS-0065 East



Waste Treatment Plant Dangerous Waste Permit Surveillance for the
High Level Waste Miscellaneous Treatment Unit Subsystems

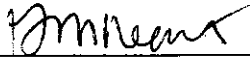
Appendix A (continued)

Figure 4
Building 222-SA



Waste Treatment Plant Dangerous Waste Permit Surveillance for the
High Level Waste Miscellaneous Treatment Unit Subsystems

Signature



Gae M. Neath
Surveillance Team Lead

11/26/2007

Date